

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<hr/> THEOPHALIS (BINKY) WILSON	:	
v.	:	NO: 21-cv-02057-JMY
<hr/> CITY OF PHILADELPHIA	:	
<hr/> CHRISTOPHER WILLIAMS	:	CONSOLIDATED
v.	:	
<hr/> CITY OF PHILADELPHIA	:	NO: 21-cv-05268-JMY

**FIRST STATUS REPORT ON BEHALF OF DEFENDANTS,
FRANK JASTRZEMBSKI AND MANUEL SANTIAGO**

On April 25, 2022, the Court entered a limited stay, by consent, as to defendants, Frank Jastrzembski and Manuel Santiago pending the outcome pending criminal proceedings at Commonwealth v. Jastrzembski, MC-51-CR-0015176-2021 and Commonwealth v. Santiago, MC-51-CR-0015178-2021. The Court further ordered that a status report be provided every sixty days regarding the criminal proceedings.

The charges at issue in both proceedings were held for trial in April 2022, and are scheduled for trial on September 18, 2023. Pre-trial motions are expected which could potentially result in the dismissal of the charges. In these civil cases, motions to dismiss are pending, a Rule 16 conference is scheduled but has not yet been held, and no deposition discovery has begun. As there is presently no pressing need for discovery from defendants Jastrzembski and Santiago, it is requested that the stay remain in place pending the next status update due in sixty days.

Respectfully submitted,

By: **BENNETT, BRICKLIN & SALTZBURG LLC**
/s/ Nicholas A. Cummins
NICHOLAS A. CUMMINS
Attorney I.D. 203238
1500 Market Street, 32nd Floor
Philadelphia, PA 19102
(215) 665-3328 / cummins@bbs-law.com
Attorney for Defendants,
Frank Jastrzembski and Manuel Santiago

Date: June 21, 2022

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THEOPHALIS (BINKY) WILSON	:	
v.	:	NO: 21-cv-02057-JMY
CITY OF PHILADELPHIA	:	
CHRISTOPHER WILLIAMS	:	CONSOLIDATED
v.	:	
CITY OF PHILADELPHIA	:	NO: 21-cv-05268-JMY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Status Report was served on this date on all interested counsel by way of electronic filing with the Court.

BENNETT, BRICKLIN & SALTZBURG LLC

By: /s/ Nicholas A. Cummins

NICHOLAS A. CUMMINS

Attorney I.D. 203238

Centre Square, West Tower

1500 Market Street, 32nd Floor

Philadelphia, PA 19102

(215) 665-3328

cummins@bbs-law.com

Attorney for Defendants,

Frank Jastrzembski and Manuel Santiago

Date: June 21, 2022